

REMARKS

Claims 1-4, 6-12, and 14-25 are pending in the application. Claims 5 and 13 have been cancelled without prejudice to refile. Claims 1, 8 and 23 have been amended to clarify the invention that is claimed. Claim 19 has been amended to correct an obvious typographical error. Claims 24 and 25 have been added to clarify the invention that is claimed. None of the amendments to the claims is intended to narrow the scope of the claims. No new matter has been added by any of the amendments to the claims. Because applicants previously paid for 5 independent claims and 23 total claims, no additional fees are required by this amendment.

Claims 1-23 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Chuah (U.S. Pub. No. 2003/0076803) (Office action, pp. 2-5). Applicants respectfully traverse the rejection of claims 1-23 and request reconsideration.

Regarding the rejection of claims 1-23 under 35 U.S.C. § 102(e) as allegedly anticipated by Chuah, applicants respectfully submit that Chuah fails to teach or suggest each and every element recited by claims 1-23.

Each of independent claims 1 and 8 recites a wireless communication system that includes, inter alia, a core system adapted to establish a first set of redundant communication paths between the core system and a plurality of radio access network session clients, and a base transceiver station adapted to establish a second set of redundant communication paths between the base transceiver station and the plurality of radio access network session clients, wherein the first and second sets of redundant communication paths are adapted to simultaneously convey communications associated with a mobile communication device.

Chuah fails to teach or suggest each and every element recited in independent claims 1 and 8. For example, Chuah does not disclose, teach, or suggest “first and second sets of redundant communication paths [being] adapted to simultaneously convey communications

associated with a mobile communication device,” as recited by each of independent claims 1 and 8. Instead, Chuah merely describes a reconfigurable radio access network system that can be configured such that different wireless units (112a-b), which are simultaneously being serviced by the same base stations (106a-c) during soft handoff communications, can communicate with different base station controllers (108a-b) using a plurality of connections or legs (114a-c, 116a-c). For example, one wireless unit (112a) can be in soft handoff with base stations (106a-c) at the same time as another wireless unit (112b) is in soft handoff with the same base stations (106a, 106b, 106c). In such a configuration, the wireless unit (112a) is connected to base station controller (108a) via connections or legs (114a-c), while the additional wireless unit (112b) is connected to a different base station controller (108b) via additional connections or legs (116a-c). (Chuah, FIG. 5 and para. [0029]).

Accordingly, applicants respectfully submit that Chuah does not disclose, teach, or suggest redundant communication paths that are adapted to simultaneously convey communications associated with a mobile communication device, as recited by independent claims 1 and 8. Because Chuah fails to disclose, teach, or suggest each and every element recited by independent claims 1 and 8, it follows that independent claims 1 and 8 are not anticipated or rendered obvious by Chuah. Therefore, independent claims 1 and 8 are allowable. Claims 2-4, 6, and 7 depend from claim 1 and are, therefore, allowable for at least this same reason. Claims 9-12 and 14 depend from claim 8 and are, therefore, allowable for at least this same reason.

Similarly, independent claim 15 recites a wireless communication system that includes, inter alia, a core system and a base transceiver station that are adapted to convey communications associated with a mobile communication device using a plurality of redundant communication paths. Likewise, independent claim 19 recites a wireless communication system that includes, inter alia, a plurality of communicatively coupled radio

access networks adapted to establish redundant communication paths for a mobile device. Still further, independent claim 22 recites a method for reallocating a radio access network session client within a wireless communication system that includes, inter alia, establishing first and second sets of redundant communication paths for a mobile device. Accordingly, the arguments raised above with respect to claims 1 and 8 apply with equal force to claims 15, 19, and 22. Because independent claims 15, 19, and 22 are not anticipated or rendered obvious by Chuah, it follows that claims 16-18 (which depend from claim 15), claims 20 and 21 (which depend from claim 19), and claims 23-25 (which depend from claim 22) are allowable for at least this same reason.

In view of the foregoing, applicants respectfully request reconsideration and withdrawal of the rejection of the claims at issue, and allowance thereof. The examiner is encouraged to contact the applicants' undersigned attorney with any questions regarding this response or the application as a whole. If there are any additional fees or refunds required, the Commissioner is directed to charge or debit Deposit Account No. 13-2855.

Respectfully submitted for,
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November 10, 2004

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